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Filing date: **11/09/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

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|------------------------|---|
| Proceeding | 91218800 |
| Party | Defendant Matosantos Commercial Corp. |
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| Submission | Motion to Extend |
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| Signature | /Samuel F. Pamias/ |
| Date | 11/09/2015 |
| Attachments | MOTION REQUESTING EXTENSION OF TIME WO CONSENT TO RESPOND TO MOTION TO AMEND-jlr.pdf(258022 bytes) |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

KIMBERLY-CLARK WORLDWIDE,
INC.

Opposer

v.

MATOSANTOS COMMERCIAL
CORP.

Applicant

Opposition No. 91218800

Serial No. 85/901,644

Mark: TENDER PUFF BATHROOM TISSUE
and Design

Filing Date: April 11, 2013

Publication Date: April 15, 2014

UNITED STATES PATENT AND TRADEMARK OFFICE

Trademark Trial and Appeal Board

P.O. Box 1451

Alexandria, VA 223 13-1451

**MOTION REQUESTING AN EXTENSION OF TIME WITHOUT CONSENT TO
RESPOND TO OPPOSER'S MOTION TO AMEND NOTICE OF OPPOSITION**

COMES NOW Applicant, Matosantos Commerical Corp. ("Applicant"), by and through their undersigned attorneys and respectfully set forth and pray as follows:

1. On October 20, 2015, Kimberly-Clark Worldwide, Inc. ("Opposer") filed with the Trademark Trial and Appeal Board ("TTAB") a Motion for Leave to Amend Notice of Opposition ("Motion to Amend"), requesting that its proposed Amended Notice of Opposition be entered.

2. Pursuant to 37 CFR §2.127(a) and Rule 113.05 of the TTAB Manual of Procedure ("TBMP"), Applicant had fifteen (15) days, plus five (5) additional days, that is until November 9, 2015, to respond to Opposer's Motion to Amend.

3. However, in its Motion to Amend, Opposer made several factual and legal allegations and arguments that require further study and analysis by Applicant in order to properly respond to Opposer's Motion to Amend.

4. Undersigned counsel tried to contact Opposer's counsel to obtain consent for an extension of time but by the end of the workday had not received a response from Opposer's counsel.

5. Therefore, pursuant to Rule 509 of the TBMP, Applicant respectfully requests the Board a 10-day extension of time to respond to Opposer's Motion to Amend.

6. Applicant respectfully avers that this request is not made with the purpose to cause delay or prejudice to Opposer, but rather, in an effort to fully and responsibly address and oppose Opposer's request to Amend.

WHEREFORE, Applicant hereby respectfully requests the Board to take notice of the foregoing circumstances and grant Applicant a 10-day extension of time to respond to Opposer's Motion to Amend.

RESPECTFULLY SUBMITTED.

This 9th day of November, 2015

IT IS HEREBY CERTIFIED that on this date, a true and correct copy of the foregoing "MOTION REQUESTING AN EXTENSION OF TIME WITHOUT CONSENT TO RESPOND TO OPPOSER'S MOTION TO AMEND NOTICE OF OPPOSITION" was served by first class mail, postage prepaid, upon the Opposer's representative: Jennifer E. Hoekel, Armstrong Teasdale LLP, 7700 Forsyth Boulevard, Suite 1800, Saint Louis, MO 63105.

On this 9th of November, 2015.

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